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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th St., SW, Room TWB-204
Washington, DC 20554

Re: Notice of Ex Parte Presentation: Second Further Notice of Proposed Rulemaking, CC
Docket No. 98-121

Dear Ms. Salas:

On Friday, September 10, 1999, David Eppsteiner, Sharon Norris, Virginia Tate, Jay Bradbury and I of AT&T, had a telephone conference with Andrea Kearney and Bill Agee of the Common Carrier Bureau regarding the shortcomings of the third party OSS testing being conducted in Georgia. The substance of our position regarding that testing is reflected in the attached two document copies of which were provided to Ms. Kearney and Mr. Agee on Friday, September 10, 1999.

Two copies of this Notice are being submitted in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert W. Quinn, Jr.", with a stylized flourish at the end.

Enclosures

cc: Andrea Kearney
Bill Agee
David Eppsteiner
Sharon Norris
Virginia Tate
Jay Bradbury

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HP's Revision of the Georgia Third Party Master Test Plan

THE REVISED MTP STILL DOES NOT ANSWER THE CRUCIAL QUESTIONS

- Is BellSouth providing access that is equivalent to the access the BOC provides to itself and/or
- Access sufficient to allow an efficient competitor a meaningful opportunity to compete and/or
- Interconnection at least equal in quality to that provided to itself

None of these questions can be answered without comparison to BellSouth's retail operational performance data. At no point in any test, compilation, analysis or report listed in the Revised MTP is any comparison to BellSouth's retail operations provided.

THE REVISED MTP DOES NOT PROVIDE FOR AN AUDIT/VALIDATION OF BELL SOUTH'S OWN OPERATIONAL DATA, OR THE OPERATIONAL DATA BELL SOUTH REPORTS FOR ITS DELIVERY OF SUPPORT TO CLECS.

THE FLOW-THROUGH AUDIT DOES NOT COMPLY WITH THE GEORGIA COMMISSION'S ORDER

The Commission clearly ordered an audit of the latest three months of the operational Flow-Through Data being reported to it in BellSouth's monthly SQMs. The Revised MTP provides only for a self-contained audit of the transactions generated by the test.

THE REVISED MTP DOES NOT PROVIDE ANY EVALUATION CRITERIA FOR ANY TEST.

Despite the complete revision of Appendix D, the Revised MTP does not establish any performance standard or benchmark against which to measure BellSouth's performance.

Nothing about the test allows any comparison that would allow a determination of the absence or presence of parity. Likewise, no statistical methodology is established to determine the significance of any differences in performance even within the closed loop of the test.

THE REVISED MTP REMAINS TOO LIMITED IN SCOPE

Functionality testing is limited to 2 wire analog loops and ports and their combination with and without Number Portability. This represents about 5-7% of the CLEC business process with BellSouth.

Testing does not cover all interfaces. LENS, which is not included, currently provides 94% of all CLEC orders submitted to BellSouth electronically and until recently 100% of pre-order queries. Furthermore, 55% of all CLEC orders are submitted to BellSouth today by manual processes (fax, mail, overnight, etc.). Of the 45% that are submitted electronically it appears from available BellSouth data that at least 60% of business orders and at least 20% of residential orders fallout for manual processing on the BellSouth side of the interface. None of BellSouth's processes supporting this activity will be reviewed in the test.

The Revised MTP also largely ignores Relationship Management and Infrastructure. This includes Change Management / Interface Development / Account Establishment & Management / Network Design, Collocation, and Interconnection Planning / System Administration Help Desk / CLEC Training / Forecasting. The Revised MTP makes only a half-hearted attempt at addressing Change Management and Forecasting.

THE REVISED MTP EVALUATION OF CHANGE MANAGEMENT IS FOCUSED ON FUTURE EVENTS RATHER THAN ON THE IMPACT OF ACTUAL CHANGES THAT HAVE OCCURRED

THE TEST INTERFACES

Under the Revised MTP, HP is to be given and use what are in fact BellSouth's internal systems testing tools as the interfaces. The interface building step in market entry is totally dependent upon the accuracy and adequacy of BellSouth's documentation. The functionality and performance obtained through the use of BellSouth's test systems provides incomplete data on either the functionality and performance of interfaces available to CLECs or on how difficult it was/is to build, operate, and maintain those interfaces. Interface development has been a key element in other Third Party Test.

THE "TEST BED" DOES NOT PROVIDE FOR "BLIND" TESTING

The number and types of accounts in the test bed is unknown, but appears to be limited given the cautions in the Ordering and Provisioning sections of the Revised MTP. A limited test bed will fail to provide for "blind testing" and in NY was a cause of delays in test execution. Additionally, the Revised MTP continues to provide segregated databases for test bed information. This isolation means that the test never contests for access to databases as the operational CLEC interfaces do.

Overview of Georgia Third Party Test (TPT) Plan

Essential Elements of a Third Party Test Plan	Concerns with Initial Plan Version 1.0	Concerns with Revised Master Test Plan (RMTP) Version 2.0
<p>There should be a neutral, independent tester. The value of third party testing can only be achieved if that party is seen as credible and its evaluation will be seen as objective and unbiased.</p>	<p>The roles of the testers are limited and lack independence.</p> <ol style="list-style-type: none"> 1. BellSouth engaged the third party testers (TPTs) and prepared the test plan, eliminating independence. The TPTs merely follow BellSouth's plan. 2. The roles of the TPTs are different – and more limited – than in the NY test. 3. In NY, for example, KPMG prepared and managed the test, and also fulfilled the functions of the pseudo-CLEC's 	<ol style="list-style-type: none"> 1. HP appears to have revised to the test plan, however, they made very few enhancements. The evaluation criteria has been further defined, but remains vague, incomplete, and inconsistent with other portions of the plan. For example, the Revised Master Test Plan (RMTP) uses undefined terms such as “timely”, “that are relevant to a CLEC”, and “intervals are reasonable” to describe evaluation measures. (See Appendix D1, pages 6 & 7 of RMTP.) Further, in some cases, HP's revisions further limit the test.(See list of some limitations on page 3 below) 2. Concerns not remedied. 3. Changes were limited to the identification of HP as the test manager. (See Section II, pages 2 and 3 of RMTP)

	<p>marketing, sales and customer service organizations, preparing and making all test case inputs for the interface systems. In contrast, the GA plan does not provide for a Test Manager other than BellSouth, and KPMG functions as an auditor.</p> <p>4. In NY, HP's role was that of the pseudo-CLEC's Information Technology group, building and maintaining the interfaces and inputting the KPMG-prepared test cases when required. The GA plan calls for HP to conduct the test using BellSouth's interfaces, rather than building its own, and to fulfill roles outside its area of expertise and beyond those played in NY, including acting as a surrogate marketing, sale and customer service organization by preparing and constructing test case inputs.</p>	<p>4. Concerns not remedied.</p>
<p>The neutral, independent third party should develop the test plan. The third party responsible for monitoring and evaluating BellSouth's performance should be the party responsible for developing the test plan, after taking input from all parties, including BellSouth.</p>	<p>1. E&Y appears to have developed the test plan on BellSouth's behalf. There was no input to the plan development from the named testers, or the CLEC community. Therefore, the parties responsible for implementing the plan or who would benefit from a comprehensive plan has not been involved in its design.</p>	<p>1. HP was involved in the revisions. However revisions such as the following taken from page Section II-2 page 2 of the RMTP cause concern regarding HP's ability to operate independently from BellSouth, "This testing, combined with a review of the interface documentation and business rules, <u>will provide evidence that CLECs are able to utilize the interfaces from the documentation and training BellSouth supplies, and to develop and submit accurate and complete transactions using these interfaces.</u>" (emphasis added) HP appears to have pre-</p>

		<p>determined the outcome of the test. Moreover, it appears that the CLECs remain uninvolved in any aspect of this test. (The test plan provides conflicting information as some test activities relating to documentation review appear to indicate CLEC interviews, but the test techniques in both the test plan framework in Section III, page 3 of the RMTP and the evaluation criteria in Appendix D-1, pages 3-5, do not.)</p>
<p>The test must be conducted by the third party, not just monitored by it. Using existing new entrants to conduct the test, with their specific market plans and interfaces, will not test the broad range of functionality and support required of an RBOC, nor will it test the RBOC's current state of readiness.</p>	<p>The roles of the TPTs are circumscribed by the plan, limiting the test to those circumstances and scenarios prescribed by BellSouth. Additionally, the plan includes conflicting information regarding whether HP will build an interface or use BellSouth test facilities.</p> <ol style="list-style-type: none"> 1. KPMG's assigned roles are to approve the test plan and to audit, monitor, evaluate and report, while HP is to conduct feature, function and volume testing using BellSouth's interfaces. These are not the roles performed by these parties in the NY test, and the assigned roles fail to utilize their expertise. 2. The test plan does not address the test manager role. 	<p>Concerns not remedied.</p> <ol style="list-style-type: none"> 1. Concerns not remedied. KPMG merely audits the work of HP as the test manager, rather than auditing BellSouth's actual performance. 2. Limited general information was provided indicating that HP is the test manager. (See Section II, pages 2 and 3 of RMTP)

<p>The test should cover all OSS and support processes needed by the new entrant to enter the market. Operations support systems include systems, information and personnel that support network elements or services. They are the automated and manual processes required to make resale services and unbundled network elements, among other items, meaningfully available to competitors.</p>	<p>The test plan is severely limited in scope and scale, and will only test a few of the UNEs and interfaces used by competitors, drastically limiting the test's usefulness to regulators and competitors.</p> <ol style="list-style-type: none"> 1. Only five UNE products will be tested, although the test plan states that BellSouth offers 80 UNEs. 2. Functionality testing will occur only within the 2-wire analog world, which represents only 5-7% of the products CLECs currently order. 3. There is no testing of resale functions, despite the fact that most CLECs currently compete via resale. 4. There is no testing of manual ordering despite the fact that BellSouth requires that 	<p>The revised test plan is further limited.</p> <ul style="list-style-type: none"> --net reduction in the number of test scenarios for UNEs by 20% (See Appendix B-3 of RMTP) --reduced the number of billing activities to be reviewed, e.g. eliminated Billing Usage Returns Evaluation (See Section VI, pages 9-11 of RMTP) --further limited repair testing to include only test cases (See Section VII page 2 of the RMTP) --eliminated billing from the change management review (See Section VII page 3 of the RMTP) --reduced the types of pre-order transactions to be tested, e.g. eliminated scenarios calling for the retrieval of CSRs for CLEC's existing customers. (See Appendix B1, pages 4 & 5 of the RMTP) <ol style="list-style-type: none"> 1. Concerns not remedied. 2. Concerns not remedied. 3. Concerns not remedied. 4. Concerns not remedied.
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	<p>the majority of the products and services it offers CLECs be ordered manually.</p> <ol style="list-style-type: none"> 5. The plan does not call for testing interconnection OSS, or the majority of BellSouth information and services that CLECs rely upon to enter the market. 6. LENS will not be tested, despite the fact that the majority of competitors use it to order service today. 7. It appears that the 3PT tester will not build an interface to test BellSouth's OSS, but will instead will use BellSouth provided test tools. 8. It appears that EDI-mainframe will not be tested. 	<ol style="list-style-type: none"> 5. Concerns not remedied. 6. Concerns not remedied. 7. Concerns not remedied. 8. Concerns not remedied.
<p>The test plan should allow the TPT to 'stand in the shoes' of a CLEC entering BellSouth's market, so it will be able fairly to evaluate BellSouth's performance with regard to all tasks normally performed in conjunction with a CLEC's market entry, including such areas as:</p> <ul style="list-style-type: none"> • Interconnection, and network planning • Account management process • Training • Interface development, including BellSouth's documentation, with review of such items as technical specifications, business rules, CLEC handbooks, etc. • Change Control Processes – all changes to systems, processes and documentation during the test must be made through the 	<p>The test plan will not allow the TPT to assess BellSouth's performance on most areas critical to CLECs' ability to enter the local market, which have been the subject of much dispute at state commissions. Unlike the NY plan,</p> <ol style="list-style-type: none"> 1. The business needs of CLECs are not represented in the GA test, since CLECs were not polled during plan development, nor are they a part of the implementation of the test. 2. There is no evaluation (not even a document review) of the processes necessary to establish a CLEC account and business relationship with BellSouth; instead, the testers will be provided with a pre-existing set of identifiers, 	<ol style="list-style-type: none"> 1. Concerns not remedied. 2. Although the RMTP makes a reference in Section II, page 4 to utilization of the account team, there is no requirement in the plan (unlike New York and Pennsylvania) which provides for an analysis of this function.

<p>established Change Control or Account Management Process, whether initiated by BellSouth or requested by the TPT or a CLEC</p> <ul style="list-style-type: none"> • Test plan should include an evaluation of BellSouth's compliance with its established procedures. 	<p>authorizations and passwords.</p> <ol style="list-style-type: none"> 3. There is no evaluation of processes necessary to conduct business with BellSouth on an on-going basis through an assigned account team. 4. No test activities address network design, collocation, or interconnection planning, which are areas of great concern to CLECs. 5. HP will use BellSouth's internal systems testing tools, including BellSouth's internal sending and receiving simulators, but the functionality of BellSouth's internal simulators (unlike its interfaces) is not at issue. 6. BellSouth's plan to review change control is inadequate. Not only is BellSouth's decision to "maintain a stable OSS environment for the duration of the test" inconsistent with CLEC's experience of constant change, its change control proposal is designed to ignore the way changes are made. By focusing only on the Electronic Interface Change Control process, the review will not address the manner in which most changes are made to 	<ol style="list-style-type: none"> 3. Although the RMTP makes a reference in Section II, page 4 to utilization of the account team, there is no requirement in the plan (unlike New York and Pennsylvania) which provides for an analysis of this function. 4. Concerns not remedied. 5. Concerns not remedied. HP attributes the use of internal testing tools to "operational and time constraints of the procedural Order" in Section II, page 2 of the RMTP. However, a review of the PSC Orders in this matter reveals no operational or time constraints that would dictate the use of test tools. 6. Further limited through the elimination of billing from the review. Additionally, the extreme limitations described to the left will likely result in the OSS 99 debacle (see note below), a major OSS (attempted) upgrade, being overlooked in the change control review process. <p>Note: After a year of arduous joint negotiations and development efforts, BellSouth announced three days before</p>
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	<p>interfaces and related documentation needed by CLECs. Further, the review of the change management process involves only document review and interviews, with no observation or usage of the process.</p>	<p>the committed start date for joint testing that it had unilaterally decided to delay the start of testing for 10 weeks and the completion of implementation for 6 months.</p>
<p>The test must be designed to determine parity. The test must not only be designed to objectively and accurately capture and analyze performance data that reveals how BellSouth is providing service to new entrants, but also how those results compare to the service BellSouth provides itself and its affiliates.</p>	<ul style="list-style-type: none"> • The test plan provides no way to assess parity. <ol style="list-style-type: none"> 1. The plan will not allow an independent assessment of BellSouth's internal performance and does not provide for validation of BellSouth's existing performance measures and results for either retail or wholesale performance. No performance standards are established for the test. 2. There is no review of or comparison to any aspect of BellSouth's retail operations. 3. Thus, the test will not allow CLECs or regulators to determine the relative level of BellSouth's performance. 4. The flow-through audit does not comply with the GA PSC's order in that it provides only for a self-contained audit of the transactions generated by the test, rather than an audit of the last three months of the operational flow through data currently reported monthly by BellSouth to the GA PSC. 5. BellSouth ensures its success by structuring the test so that if it cannot perform the function or perform it effectively, it declares that the outcome to 	<ol style="list-style-type: none"> 1. Concerns not remedied. Despite the revisions to Appendix D of the RMTP to include a copy of an unapproved version of BellSouth's SQM, the RMTP does not establish any objective performance standard or benchmark for any test activity. 2. Concerns not remedied. 3. Concerns not remedied. 4. Concerns not remedied. 5. Concerns not remedied.

	be the expected result, or declares the function outside the scope of the test. For example, billing ; usage accuracy is tested not by whether the data is accurate, but how fast it is sent, the evaluation of the Maintenance and Repair processes does not test the actual maintenance and repair of service, etc..	
All Operations Support Systems and OSS versions that actually will be used should be tested. All OSS functions, (i.e., pre-order, ordering, provisioning, billing and repair) must be tested. Omission of any of these items leaves critical gaps in the processes necessary to provide service to the customer. For example, if a service can be provisioned but billing information is inaccurate or untimely, the CLEC receives discriminatory treatment. This comprehensive testing necessarily includes all operational support systems, including all procedures, processes and systems offered by BellSouth for use by new entrants.	<p>The limited interfaces, processes and product types being tested, discussed above, severely limit the usefulness and effectiveness of the test.</p> <ol style="list-style-type: none"> 1. Additionally, the test does not cover critical improvements needed by CLECs in the OSS 99 upgrade. 2. LENS is not tested, although it is the sole interface used by the majority of CLECs. 3. The test covers only a small subset of BellSouth's OSS. 	<ol style="list-style-type: none"> 1. Concerns not remedied. 2. Concerns not remedied. 3. Concerns not remedied.
The test must cover the full range of products, including services BellSouth offers or is required to offer, but is not providing today. Any limitation on testing runs the risk of favoring one market entry mode over another. As BellSouth is required to support all forms of market entry, all forms should be tested. And because these processes constantly being modified, BellSouth's change	<p>Functionality testing is limited to 2-wire analog loops and ports, separately and in combination with number portability.</p> <ol style="list-style-type: none"> 1. Testing of these limited numbers of UNEs is further limited in that they will not be tested over the full range of pre-ordering, ordering, provisioning, billing, maintenance and repair processes. 2. Since BellSouth will "maintain a stable 	<ol style="list-style-type: none"> 1. Concerns not remedied. 2. Concerns not remedied.

control processes must also be subject to review.	OSS environment" during the test, the test results cannot be extrapolated to predict BellSouth's continued ability to process even these limited types of orders unless its change control process is reviewed.	
<p>Test the ability of BellSouth to provide non-discriminatory support at commercial volumes. The goal of testing is not simply to confirm that a particular functionality or new methodology exists, but to determine if new entrants can use these items to create meaningful competition. Therefore no test is complete without simulating the demands of a robust marketplace on BellSouth's operations support systems, including its procedures and its people who perform the work.</p>	<p>The test plan allows BellSouth to determine what constitutes normal and peak transactions of volumes and numbers of users.</p> <ol style="list-style-type: none"> 1. The plan is extremely vague on this subject. 2. Additionally, the test clearly is not "blind", so BellSouth would be well able to prepare for test dates and volumes/types of orders that will arrive on any given date. Thus, it cannot neither simulate nor test BellSouth's performance in a production environment. 	<ol style="list-style-type: none"> 1. Concerns not remedied. 2. HP's claims in Section II, page 2 of the RMTP that testing will be "blind" is not accurate. Test orders will be uniquely identified, and the plan states that the "Test Cycle Manager will coordinate with BellSouth to ensure that BellSouth's and HP's performance measurements system are prepared to track test transaction performance prior to beginning the Test." This phrase or something similar appears in the description of every transaction oriented test cycle. (For example, see RMTP, Section V, page 2, last paragraph) Additionally, provisioning is very orchestrated, with HP to "verify the provisioning appointment date and time" and "meet BellSouth provisioners for appointment." (See RMTP, Section V, page 21) No CLEC live orders, the only actual blind orders, will be used in the

<p>Don't just test it, fix it. The purpose of the test is to facilitate market entry. BellSouth therefore should be required to promptly correct all deficiencies uncovered by the test.</p>	<p>The plan only requires re-testing of failures or defects related to program errors. Thus, if the program works as designed, but the design is flawed, no re-testing is required. Similarly, if the program works as designed but BellSouth's documentation is incorrect, no re-testing is required.</p> <ol style="list-style-type: none"> 1. The test plan is designed to "prove the existence" of specified functionalities, with no provision for correction of deficiencies unrelated to program or system errors. Basic design or execution flaws would be neither detected nor corrected. 	<p>provisioning test.</p> <ol style="list-style-type: none"> 1. Concerns not remedied. Additionally, the exception process remains undefined.
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